

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

JOAN M. AVON, et. al.,
Plaintiff(s)

-vs-

T&N LIMITED, et al.,
Defendant(s).

Civil Action No. 13-7530(FLW)

DECLARATION OF JOHN E. HERRICK IN SUPPORT OF APPLICATION FOR
PRO HAC VICE ADMISSION

I, John E. Herrick, declare as follows:

1. My name is John E. Herrick, I am a current resident of 4149 Colonel Vanderhorst Circle, Mount Pleasant, South Carolina 29466.
2. I am an attorney with the law firm of:

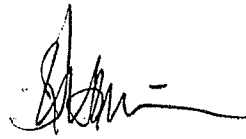
Motley Rice LLC,
28 Bridgeside Boulevard
P.O. Box 1792
Mt. Pleasant, South Carolina 29465
Telephone (843)216-9000
Facsimile (843)216-9440
E-mail jherrick@motleyrice.com
3. I have been retained by the Plaintiff to act as counsel in this matter.
4. The Plaintiff has retained William L. Kuzmin and Christopher Placitella of Cohen, Placitella & Roth to act as local counsel in this matter, with offices located at 127 Maple Avenue, Red Bank, NJ 07701, upon whom all notices, orders and pleadings may be served.
5. I am requesting to be admitted *Pro Hac Vice* in the above-styled cases pending in the United States District Court, District of New Jersey.
6. I am not admitted to practice law in the State of New Jersey. Therefore, I respectfully submit this declaration in support of my application for admission *pro hac vice* in this matter pursuant to Rule 101.1 of the Local Civil Rules for the United States District Court for the District of New Jersey.

7. I am familiar with the Federal Rules of Civil Procedure, the Local Civil Rules for the United States District Court for the District of New Jersey, and the Rules of Professional Conduct as enacted by the New Jersey Rules of Court and amended by the New Jersey Supreme Court.
8. I agree to make payment to the New Jersey Lawyers' Fund for Client Protection, as provided by Rule 1:28-2(a) of the New Jersey Rules of Court, for any year in which I represent the Plaintiff.
9. I agree to make payment in the amount of \$150.00 for the Clerk, United States District Court within 20 days from the date of the executed Order.
10. I understand that, if I am admitted to this Court, *pro hac vice*, I will be within the disciplinary jurisdiction of this Court.

Pursuant to 28 U.S.C. 1746, I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: March 14, 2014

BY: _____

A handwritten signature in black ink, appearing to be "Sham", written over a horizontal line.

The Supreme Court of South Carolina

Certificate of Good Standing

I, Daniel E. Shearouse, Clerk of the Supreme Court of South Carolina, do hereby certify that John Eugene Herrick was duly sworn and admitted as an attorney in this state on November 16, 1988, and is currently a regular member of the South Carolina Bar in good standing.

DANIEL E. SHEAROUSE, CLERK

BY Gayle B. Watts
DEPUTY CLERK FOR BAR ADMISSIONS

Columbia, South Carolina

January 17, 2014

**Court of Appeals
of Maryland
Annapolis, MD**



CERTIFICATE OF GOOD STANDING

STATE OF MARYLAND, ss:

*I, Bessie M. Decker, Clerk of the Court of Appeals of Maryland,
do hereby certify that on the twenty-fourth day of March, 1999,*

John Eugene Herrick

*having first taken and subscribed the oath prescribed by the Constitution and
Laws of this State, was admitted as an attorney of said Court, is now in good
standing, and as such is entitled to practice law in any of the Courts of said
State, subject to the Rules of Court.*

*In Testimony Whereof, I have hereunto
set my hand as Clerk, and affixed the Seal
of the Court of Appeals of Maryland, this
twenty-second day of January, 2014.*

Bessie M. Decker

Clerk of the Court of Appeals of Maryland